

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RONALD C. TATUM,)	
)	
Plaintiff,)	
)	Case No. 21-cv-06732
v.)	
)	Judge Sharon Johnson Coleman
10 ROADS EXPRESS, LLC,)	Magistrate Judge Beth Jantz
)	
Defendant.)	JURY DEMANDED

SCHEDULE 8(B) – DEFENDANTS’ PROPOSED VOIR DIRE

10 Roads Express, LLC and 10 Roads South, LLC (collectively “10 Roads Express”), by their attorney, Joseph K. Nichele of Momkus LLP, proposes that the following additional questions be asked of the venire.

1. Have you or any close friend or member of your family sued an employer or former employer? If so,
 - a. What was the nature of the lawsuit?
 - b. What was the result of the suit?
 - c. If resolved at trial, awarded money? How much?
2. Have you or any close friend or member of your family supervised employees? If so,
 - a. What position?
 - b. For how long?
 - c. How many employees did you supervise?
3. Do you, or does a close friend or member of your family, have special knowledge or training regarding personnel or human resources policies? If so, explain.

4. Have you or a close friend or family member ever worked in a personnel or human resources department of a company?
5. Have you or a close friend or family ever filed a claim for workers compensation?
6. Ever injured while at work?
7. Ever heard the phrase when someone says they are “tapping out?”
 - a. What is your understanding what that means?
8. Is there anyone sitting here that it is just your nature to side with an employee rather than an employer?
9. Raise your hand if you are of the opinion that companies, their managers/supervisors cannot be trusted to be fair?
10. Does everyone understand that there are two sides to this dispute? Two sides to the story?
11. By rule, the plaintiff gets to go first. Can you wait until you have heard both sides of the story and all the testimony from all of the witnesses before you form any conclusions in this case?
12. Both sides want a fair and impartial jury. Is there anything that would cause you to rule against the Defendants even if the evidence and the instructions from the court required decision in the Defendants favor?

10 ROADS EXPRESS, LLC, and
10 ROADS SOUTH, LLC,

By: /s/ Joseph K. Nichele
One of their Attorneys

Joseph K. Nichele (jnichele@momkus.com)

Momkus LLP

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